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March 24, 2021

Hon. Joel Schneider, USMJ
United States Courthouse
One John F. Gerry Plaza
Fourth & Cooper Streets, Room 2060
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al
Docket No. 1:17-CV-2864-NLH
Our File No. 1565.91386 - LMS

Dear Judge Schneider:

The court entered an order, ECF No. 73, allowing the withdrawal of our pending motion for summary judgment. The order also memorializes the agreement between counsel that the filing date for calculating when plaintiff's affidavit of merit against our client, Scott Miller, M.D., was due was November 3, 2020.

It has been more than 120 days since the filing date. No affidavit of merit has been served. We have emailed plaintiff's counsel requesting a voluntary stipulation of dismissal in favor of Dr. Miller, but have not yet received a reply.

We therefore ask the court for permission to renew the motion for summary judgment filed on behalf of Dr. Miller.

Respectfully yours,
s/ Lauren M. Strollo
Lauren M. Strollo

LMS:pm

cc: Joseph D. Lento, Esq.
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